

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

WENDY MONROY ZAPATA
Plaintiff

VS.

LANDSTAR INWAY, INC.,
DUVAL SEMI TRAILERS, AND
EDWIN HOLLAND, II
Defendants

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§

CIVIL ACTION NO. 3:22-cv-1608
JURY REQUESTED

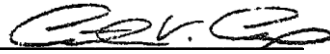
INDEX OF DOCUMENTS BEING FILED WITH NOTICE OF REMOVAL

| Exhibit | Document Title |
|----------------|---|
| Ex. A | State Court Docket Sheet; |
| Ex. B | Plaintiff's Original Petition (filed 7/5/2022); |
| Ex. C | Citation for Landstar (7/18/2022); |
| Ex. D | Citation for Edwin Holland (7/18/2022); |
| Ex. E | Citation for Duval (7/18/2022) ; |
| Ex. F | Return of Service for Landstar (7/19/2022); |
| Ex. G | Return of Service for Duval (7/19/2022) |

{SIGNATURE ON FOLLOWING PAGE}

Respectfully submitted,

COX P.L.L.C.



CLINTON COX

State Bar No. 24040738

ccox@coxpllc.com

Bill W. Sanford

State Bar No. 24041864

bsanford@coxpllc.com

8144 Walnut Hill Lane, Suite 1090

Dallas, Texas 75231

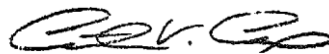
Tel: (214) 444-7050

Fax: (469) 340-1884

**ATTORNEYS FOR DEFENDANT
LANDSTAR INWAY, INC.**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on the 22nd day of July, 2022. A true and correct copy of the foregoing Index of Documents Being Filed was served upon counsel of record in compliance with the Federal Rules of Civil Procedure by e-service, e-mail, certified mail, return receipt requested, telephonic communications, hand delivery and/or U.S. Mail on this the 22nd day of July, 2022



Clinton V. Cox
Bill W. Sanford



THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

v/s.

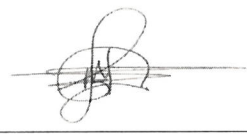
**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a **TRUE AND CORRECT COPY OF:**

DOCKET SHEET, filed on the 5th day of July, 2022. The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this **22nd day of June, 2022.**

JOHN F. WARREN, County Clerk
Dallas County, Texas

By:  Deputy Clerk
MOMODOU BAYO



COUNTY COURT AT LAW No. 2
DOCKET SHEET
CASE No. CC-22-03509-B

WENDY MONROY ZAPATA

vs.

LANDSTAR INWAY INC, A CORPORATION, DUVAL
SEMI TRAILERS, A CORPORATION, EDWIN
HOLLAND II

§
§
§
§

Location: County Court at Law No. 2
Judicial Officer: **BELLAN, MELISSA**
Filed on: **07/05/2022**

CASE INFORMATION

Case Type: **DAMAGES (COLLISION)**Case Flags: **LEVEL 2 CASE**

DATE

CASE ASSIGNMENT

Current Case Assignment

| | |
|------------------|---------------------------|
| Case Number | CC-22-03509-B |
| Court | County Court at Law No. 2 |
| Date Assigned | 07/05/2022 |
| Judicial Officer | BELLAN, MELISSA |

PARTY INFORMATION

PLAINTIFF**MONROY ZAPATA, WENDY**

12222 MERIT DRIVE
SUITE 1200
DALLAS, TX 75251

*Lead Attorneys***KELSO, RHIANNON***Retained*

214-764-9777(W)
KELSO LAW PLLC
12222 MERIT DRIVE
SUITE 1200
DALLAS, TX 75251

DEFENDANT**DUVAL SEMI TRAILERS, A CORPORATION**

1999 BRYAN ST., SUITE 900
DALLAS, TX 75201-3136




HOLLAND II, EDWIN

AN INDIVIDUAL
106 N SAND ST.
COMANCHE, TX 76442

DATE

EVENTS & ORDERS OF THE COURT




INDEX

| | |
|------------|--|
| 07/05/2022 | NEW CASE FILED (OCA) |
| 07/05/2022 |  ORIGINAL PETITION Party: PLAINTIFF MONROY ZAPATA, WENDY PLAINTIFF'S ORIGINAL PETITION |
| 07/05/2022 |  ISSUE CITATION Party: PLAINTIFF MONROY ZAPATA, WENDY ESERVE- ENV. #66405161 |
| 07/18/2022 | CITATION (SERVICE)  LANDSTAR INWAY INC, A CORPORATION Served: 07/19/2022 LANDSTAR INWAY |
| 07/18/2022 | CITATION (SERVICE) |



TRUE AND CORRECT
COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE

COUNTY COURT AT LAW No. 2
DOCKET SHEET
 CASE No. CC-22-03509-B

| | | |
|------------|--|--|
| |  DUVAL SEMI TRAILERS, A CORPORATION Served: 07/19/2022 DUVAL SEMI TRAILERS, INC. | |
| 07/18/2022 | CITATION (SERVICE) HOLLAND II, EDWIN Unserved EDWIN HOLLAND II | |
| 07/21/2022 |  RETURN OF SERVICE Party: PLAINTIFF MONROY ZAPATA, WENDY SERVED LANDSTAR INWAY INC | |
| 07/21/2022 |  RETURN OF SERVICE Party: PLAINTIFF MONROY ZAPATA, WENDY SERVED DUVAL SEMI TRAILERS, A CORP | |

DATE

FINANCIAL INFORMATION

| | |
|---------------------------------------|-------------|
| PLAINTIFF MONROY ZAPATA, WENDY | |
| Total Charges | 374.00 |
| Total Payments and Credits | 374.00 |
| Balance Due as of 07/22/2022 | 0.00 |



TRUE AND CORRECT
 COPY OF ORIGINAL
 FILED IN DALLAS
 COUNTY CLERK'S OFFICE

ORIGINAL
FILED
JUL 22 2022
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA



THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

VS.

**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a **TRUE AND CORRECT COPY OF:**

PLAINTIFF'S ORIGINAL PETITION filed on the 5th day of July, 2022. The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this 22nd day of June, 2022.

JOHN F. WARREN, County Clerk
Dallas County, Texas

By:  Deputy Clerk
MOMODOU BAYO



CC-22-03509-B

CAUSE NO: _____

WENDY MONROY ZAPATA,
Plaintiff,

v.

**LANDSTAR INWAY INC, a corporation,
and DUVAL SEMI TRAILERS, a
corporation, and EDWIN HOLLAND II,
an individual.**
Defendants.§
§
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§
§
§
§
§
§**IN THE COUNTY COURT AT LAW**

NO. _____

DALLAS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

COMES NOW, Plaintiff, **WENDY MONROY ZAPATA**, and files this original petition against Defendants, LANDSTAR INWAY, INC, a corporation, hereafter "LANDSTAR," and DUVAL SEMI TRAILERS, a corporation, hereafter "DUVAL" and EDWIN HOLLAND II, an individual, hereafter "HOLLAND," or collectively "DEFENDANTS." In support of this petition, Plaintiff would respectfully show unto the Court as follows:

I. RULE 47 STATEMENT OF RELIEF

Plaintiff prefers to have this Honorable Judge, or a jury determine the fair amount of compensation for Plaintiff's damages, and Plaintiff places the decision regarding the amount of compensation to be awarded in this Honorable Judge or jury's hands. However, pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiff is required to provide a statement regarding the amount of monetary relief sought. Accordingly, Plaintiff seeks only monetary relief over \$250,000.00 but not more than \$1,000,000.00.

II. DISCOVERY CONTROL PLAN- RULE 190.3 LEVEL II

Plaintiffs intend to conduct discovery under **Level 2** of Texas Rule of Civil Procedure 190.3.

PLAINTIFF'S ORIGINAL PETITION

Page 1 of 5

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III. PARTIES

Plaintiff WENDY MONROY ZAPATA is an individual residing in Dallas County, Texas.

Defendant, EDWIN HOLLAND II is an individual who may be served with process at defendant's usual place of residence at 106 N Sand St Comanche, Texas 76442 or wherever he may be found. **Issuance of Citation is requested at this time.**

Defendant, LANDSTAR INWAY INC is a corporation doing business in the State of Texas and may be served with process via their registered agent at 1999 Bryan St., Suite 900 Dallas, Texas 75201-3136. **Issuance of Citation is requested at this time.**

Defendant, DUVAL SEMI TRAILERS, INC is a corporation doing business in the State of Texas and may be served with process via their registered agent at 1999 Bryan St., Suite 900 Dallas, Texas 75201-3136. **Issuance of Citation is requested at this time.**

IV. VENUE & JURISDICTION

Venue is proper in Dallas County under Texas Civil Practice & Remedies Code section 15.002 because all or a substantial part of the events or omissions giving rise to the claim occurred in Dallas County. The Court has jurisdiction because Plaintiff's damages exceed the jurisdictional limits of the court.

V. FACTS

On or about February 27, 2021, Plaintiff WENDY MONROY was safely and prudently driving her vehicle, to wit, a 2018 Nissan Murano. Plaintiff was traveling westbound on Woodall Rodgers Freeway and Pearl Street in the right lane. Defendant HOLLAND was driving a truck tractor and towing a trailer, immediately behind Plaintiff MONROY. The truck trailer owned and or operated by Defendants HOLLAND, LANDSTAR and DUVAL struck the rear end of Plaintiff MONROY's vehicle. The collision caused damage to Plaintiff MONROY's vehicle and her person. The collision

was the sole results of Defendants' acts and/or omissions, singularly or in combination, and as a result of the collision, the Plaintiff suffered injuries and damages that are more fully described below.

VI. NEGLIGENCE / NEGLIGENCE *PER SE* OF DEFENDANT BRADFORD

Defendant HOLLAND had a duty to exercise ordinary care and operate his vehicle reasonably and prudently.

Defendant HOLLAND breached the duty of care in the following ways:

- a. Failing to maintain a proper lookout;
- b. Failing to maintain proper control of his vehicle;
- c. Driving his vehicle in a manner which a person of ordinary prudence would have driven under the same or similar circumstances; and

The collision between the parties was caused by the above referenced acts and/or omissions.

As a result of the collision, the Plaintiff sustained injuries and damages.

VII. RESPONDEAT SUPERIOR – DEFENDANTS LANDSTAR/DUVAL

Defendant HOLLAND'S acts and / or omissions were committed within the scope of his general authority as an employee of Defendants LANDSTAR and DUVAL. The injuries and damages sustained by Plaintiff were proximately caused by Defendant HOLLAND. Whenever in this Petition it is alleged that Defendants LANDSTAR and DUVAL did or failed to do any particular act and/or omission, it is meant that Defendant HOLLAND acting individually, or by and through agents, officers, directors, servants, and employees, either did or failed to do that particular act and/or omission, in the course and scope of his employment, agency or contract with Defendants LANDSTAR and DUVAL, and in the furtherance of Defendants' business. Pursuant to Texas Rule of Civil Procedure 28, any entity doing business under an assumed name may be sued in its assumed name for the purpose of enforcing against it a substantive right. The collision between the parties



CLINTA CLEVERLY
JUL 22 2022
FEDERAL COURT

was caused by the above referenced acts and/or omissions. As a result of the collision, the Plaintiff sustained injuries and damages.

VIII. DAMAGES

Defendant's breach of duty proximately caused injury to the Plaintiff, which resulted in the following damages:

- a. Medical expenses in the past and future;
- b. Lost wages and a diminished capacity to earn wages in the past and future;
- c. Property damage to his personal vehicle;
- d. Loss of use of vehicle;
- e. Physical pain in the past and future;
- f. Mental anguish in the past and future;
- g. Physical impairment in the past and future;
- h. Taxable court costs; and
- i. Prejudgment and post judgment interest.

Plaintiff seeks damages within the jurisdictional limits of this Court.

IX. NOTICE OF INTENT

Plaintiff hereby gives notice of his intent to utilize any and all items produced in discovery in any evidentiary hearing or at the trial in this matter, and the authenticity of such documents are self-proven per the Texas Rules of Civil Procedure 193.7.

X. MISNOMER / STATUTE OF LIMITATIONS

Plaintiff hereby gives notice that in the event Plaintiff serves a correct defendant under an incorrect name, same is a misnomer. Plaintiff hereby gives notice that any such misnomer was a mistake and notes that the applicable limitations is tolled and an amended petition identifying the defendant's correct name relates back to the date this original petition was filed.

PRAYER

For these reasons, Plaintiff respectfully asks that the Court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendant for the following:

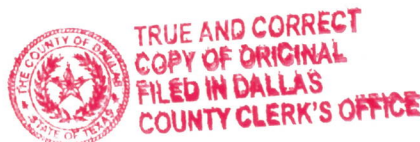



EXHIBIT 13
JUL 22 2022

- a. Actual damages (economic and non-economic);
- c. Prejudgment and post judgment interest;
- d. Court costs; and
- e. All other relief to which plaintiff is entitled.

Respectfully submitted,

KELSO LAW PLLC
12222 Merit Drive, Suite 1200
Dallas, Texas 75251
Tel. (214) 764-9777
Fax. (214) 481-2399

By: 
RHIANNON KELSO
Texas Bar No. 24080636
rkelso@kelsolegal.com



TRUE AND CORRECT
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COUNTY CLERK'S OFFICE

PLAINTIFF'S ORIGINAL PETITION

Page 5 of 5



THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

v.s.


**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a **TRUE AND CORRECT COPY OF:**

CITATION FOR LANDSTAR INWAY INC, issued on the 18th day of July, 2022. The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this 22nd day of June, 2022.

JOHN F. WARREN, County Clerk
Dallas County, Texas

By:  Deputy Clerk
MOMODOU BAYO



**THE STATE OF TEXAS
CITATION**

CAUSE NO. CC-22-03509-B
COUNTY COURT AT LAW NO. 2
Dallas County, Texas

TO:

LANDSTAR INWAY INC,
A CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136

"You have been sued. You may employ an attorney. If you or your Attorney do not file a WRITTEN ANSWER with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and PLAINTIFF'S ORIGINAL PETITION, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." Your answer should be addressed to the clerk of County Court at Law No. 2 of Dallas County, Texas at the Court House of said County, 600 Commerce Street, Suite 101, Dallas, Texas 75202.

WENDY MONROY ZAPATA
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A CORPORATION; DUVAL SEMI TRAILERS, A CORPORATION;
EDWIN HOLLAND II
Defendant(s)

Filed in said Court on the 5th day of July, 2022, a copy of which accompanies this citation.

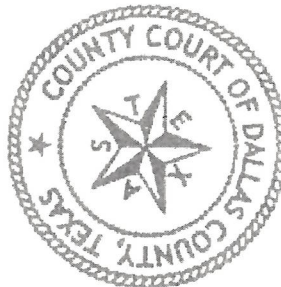
WITNESS: JOHN F. WARREN, Clerk of the County Courts of Dallas County, Texas. GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Dallas, Texas, and issued this 18th day of July, 2022 A.D.

JOHN F. WARREN, Dallas County Clerk

By Alicia Mata, Deputy
Alicia Mata



TRUE AND CORRECT
COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE



ATTORNEY

**CITATION
PLAINTIFF'S ORIGINAL PETITION
CC-22-03509-B**

IN THE COUNTY COURT OF DALLAS
County Court at Law No. 2
Dallas County, Texas

WENDY MONROY ZAPATA,
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A
CORPORATION; DUVAL SEMI
TRAILERS, A CORPORATION;
EDWIN HOLLAND II, *Defendant(s)*

SERVE:

LANDSTAR INWAY INC, A
CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136

ISSUED THIS
18TH DAY OF JULY, 2022

JOHN F. WARREN, COUNTY CLERK
BY: ALICIA MATA, DEPUTY

Attorney for Plaintiff

RHIANNON KELSO
KELSO LAW PLLC
12222 MERIT DRIVE SUITE 1200
DALLAS TX 75251
214-764-9777

NO OFFICER'S FEES HAVE BEEN
COLLECTED BY DALLAS COUNTY CLERK

OFFICER'S RETURN

CC-22-03509-B County Court at Law No. 2

WENDY MONROY ZAPATA vs. LANDSTAR INWAY INC, A CORPORATION, DUVAL SEMI TRAILERS, A CORPORATION, EDWIN HOLLAND II

ADDRESS FOR SERVICE:

1999 BRYAN ST SUITE 900
DALLAS TX 75201-3136

Fees:

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ m., and executed in _____ County, Texas by delivering to LANDSTAR INWAY INC, A CORPORATION in person, a true copy of this Citation together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION with the date and service at the following times and places to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|-------|-----------|--|
| _____ | _____ | _____ |
| _____ | _____ | _____ |

And not executed as to the defendant(s). _____

The diligence used in finding said defendant(s) being:

_____ and the cause or failure to execute this process is:

_____ and the information received as to the whereabouts of said defendant(s) being:

Serving Petition and Copy \$ _____, Officer

Total \$ _____, County, Texas

By: _____, Deputy

_____, Affiant



THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

VS.

**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a **TRUE AND CORRECT COPY OF:**

CITATION FOR EDWIN HOLLAND II, issued on the 18th day of July, 2022. The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this **22nd day of June, 2022**.

JOHN F. WARREN, County Clerk
Dallas County, Texas

A handwritten signature in blue ink, appearing to read "MOMODOU BAYO", is written over a horizontal line.

By: _____, Deputy Clerk

MOMODOU BAYO



**THE STATE OF TEXAS
CITATION**

CAUSE NO. CC-22-03509-B
COUNTY COURT AT LAW NO. 2
Dallas County, Texas

TO:

EDWIN HOLLAND II
106 N SAND ST
COMANCHE TX 76442

"You have been sued. You may employ an attorney. If you or your Attorney do not file a WRITTEN ANSWER with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and PLAINTIFF'S ORIGINAL PETITION, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." Your answer should be addressed to the clerk of County Court at Law No. 2 of Dallas County, Texas at the Court House of said County, 600 Commerce Street, Suite 101, Dallas, Texas 75202.

WENDY MONROY ZAPATA
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A CORPORATION; DUVAL SEMI TRAILERS, A CORPORATION;
EDWIN HOLLAND II
Defendant(s)

Filed in said Court on the 5th day of July, 2022, a copy of which accompanies this citation.

WITNESS: JOHN F. WARREN, Clerk of the County Courts of Dallas County, Texas. GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Dallas, Texas, and issued this 18th day of July, 2022 A.D.

JOHN F. WARREN, Dallas County Clerk

By Alicia Mata, Deputy
Alicia Mata



TRUE AND CORRECT
COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE



ATTORNEY

**CITATION
PLAINTIFF'S ORIGINAL PETITION**

CC-22-03509-B

IN THE COUNTY COURT OF DALLAS
County Court at Law No. 2
Dallas County, Texas

WENDY MONROY ZAPATA,
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A
CORPORATION; DUVAL SEMI
TRAILERS, A CORPORATION;
EDWIN HOLLAND II, *Defendant(s)*

SERVE:

EDWIN HOLLAND II
106 N SAND ST
COMANCHE TX 76442

**ISSUED THIS
18TH DAY OF JULY, 2022**

JOHN F. WARREN, COUNTY CLERK
BY: ALICIA MATA, DEPUTY

Attorney for Plaintiff

RHIANNON KELSO
KELSO LAW PLLC
12222 MERIT DRIVE
SUITE 1200
DALLAS TX 75251
214-764-9777

NO OFFICER'S FEES HAVE BEEN
COLLECTED BY DALLAS COUNTY CLERK

OFFICER'S RETURN

CC-22-03509-B County Court at Law No. 2

WENDY MONROY ZAPATA vs. LANDSTAR INWAY INC, A CORPORATION, DUVAL SEMI TRAILERS, A CORPORATION, EDWIN HOLLAND II

ADDRESS FOR SERVICE:

106 N SAND ST
COMANCHE TX 76442

Fees:

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ m., and executed in _____ County, Texas by delivering to EDWIN HOLLAND II in person, a true copy of this Citation together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION with the date and service at the following times and places to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|-------|-----------|--|
| _____ | _____ | _____ |
| _____ | _____ | _____ |

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

Serving Petition and Copy \$ _____, Officer
Total \$ _____, County, Texas
By: _____, Deputy
_____, Affiant



THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

v/s.

**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a TRUE AND CORRECT COPY OF:

CITATION FOR DUVAL SEMI TRAILERS, A CORPORATION, issued on the 18th day of July, 2022.
The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this 22nd day of June, 2022.

JOHN F. WARREN, County Clerk
Dallas County, Texas

A handwritten signature in black ink, appearing to read "MOMODOU BAYO", is written over a horizontal line.

By: _____, Deputy Clerk

MOMODOU BAYO



**THE STATE OF TEXAS
CITATION**

CAUSE NO. CC-22-03509-B
COUNTY COURT AT LAW NO. 2
Dallas County, Texas

TO:

**DUVAL SEMI TRAILERS, A CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136**

"You have been sued. You may employ an attorney. If you or your Attorney do not file a WRITTEN ANSWER with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and PLAINTIFF'S ORIGINAL PETITION, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." Your answer should be addressed to the clerk of County Court at Law No. 2 of Dallas County, Texas at the Court House of said County, 600 Commerce Street, Suite 101, Dallas, Texas 75202.

WENDY MONROY ZAPATA
Plaintiff(s)

VS.

**LANDSTAR INWAY INC, A CORPORATION; DUVAL SEMI TRAILERS, A CORPORATION;
EDWIN HOLLAND II**
Defendant(s)

Filed in said Court on the 5th day of July, 2022, a copy of which accompanies this citation.

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JOHN F. WARREN, Dallas County Clerk

By Alicia Mata, Deputy
Alicia Mata



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ATTORNEY

**CITATION
PLAINTIFF'S ORIGINAL PETITION**

CC-22-03509-B

IN THE COUNTY COURT OF DALLAS
County Court at Law No. 2
Dallas County, Texas

WENDY MONROY ZAPATA,
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A
CORPORATION; DUVAL SEMI
TRAILERS, A CORPORATION;
EDWIN HOLLAND II, *Defendant(s)*

SERVE:

**DUVAL SEMI TRAILERS, A
CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136**

**ISSUED THIS
18TH DAY OF JULY, 2022**

JOHN F. WARREN, COUNTY CLERK
BY: ALICIA MATA, DEPUTY

Attorney for Plaintiff

RHIANNON KELSO
KELSO LAW PLLC
12222 MERIT DRIVE SUITE 1200
DALLAS TX 75251
214-764-9777

NO OFFICER'S FEES HAVE BEEN
COLLECTED BY DALLAS COUNTY CLERK

OFFICER'S RETURN

CC-22-03509-B County Court at Law No. 2

WENDY MONROY ZAPATA vs. LANDSTAR INWAY INC, A CORPORATION, DUVAL SEMI TRAILERS, A CORPORATION, EDWIN HOLLAND II

ADDRESS FOR SERVICE:

1999 BRYAN ST SUITE 900

DALLAS TX 75201-3136

Fees:

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ m., and executed in _____ County, Texas by delivering to DUVAL SEMI TRAILERS, A CORPORATION in person, a true copy of this Citation together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION with the date and service at the following times and places to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|-------|-----------|--|
| _____ | _____ | _____ |
| _____ | _____ | _____ |

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

_____ and the cause or failure to execute this process is:

_____ and the information received as to the whereabouts of said defendant(s) being:

Serving Petition and Copy \$ _____, Officer

Total \$ _____, County, Texas

By: _____, Deputy

_____, Affiant



**THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551**

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

VS.

**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

*I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a TRUE AND CORRECT COPY OF:*

RETURN OF SERVICE FOR LANDSTAR INWAY INC, filed on the 21st day of July, 2022. *The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.*

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this 22nd day of June, 2022.

JOHN F. WARREN, County Clerk
Dallas County, Texas

By:  Deputy Clerk
MOMODOU BAYO



**THE STATE OF TEXAS
CITATION**CAUSE NO. CC-22-03509-B
COUNTY COURT AT LAW NO. 2
Dallas County, Texas

TO:

LANDSTAR INWAY INC,
A CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136

"You have been sued. You may employ an attorney. If you or your Attorney do not file a WRITTEN ANSWER with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and PLAINTIFF'S ORIGINAL PETITION, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org " Your answer should be addressed to the clerk of County Court at Law No. 2 of Dallas County, Texas at the Court House of said County, 600 Commerce Street, Suite 101, Dallas, Texas 75202.

WENDY MONROY ZAPATA
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A CORPORATION; DUVAL SEMI TRAILERS, A CORPORATION;
EDWIN HOLLAND II
Defendant(s)

Filed in said Court on the 5th day of July, 2022, a copy of which accompanies this citation.

WITNESS: JOHN F. WARREN, Clerk of the County Courts of Dallas County, Texas. GIVEN UNDER MY
HAND AND SEAL OF OFFICE, at Dallas, Texas, and issued this 18th day of July, 2022 A.D.

JOHN F. WARREN, Dallas County Clerk

By Alicia Mata, Deputy
Alicia MataTRUE AND CORRECT
COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE**ATTORNEY****CITATION****PLAINTIFF'S ORIGINAL PETITION**

CC-22-03509-B

IN THE COUNTY COURT OF DALLAS
County Court at Law No. 2
Dallas County, TexasWENDY MONROY ZAPATA,
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A
CORPORATION; DUVAL SEMI
TRAILERS, A CORPORATION;
EDWIN HOLLAND II, *Defendant(s)***SERVE:**LANDSTAR INWAY INC, A
CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136ISSUED THIS
18TH DAY OF JULY, 2022JOHN F. WARREN, COUNTY CLERK
BY: ALICIA MATA, DEPUTY

Attorney for Plaintiff

RHIANNON KELSO
KELSO LAW PLLC
12222 MERIT DRIVE SUITE 1200
DALLAS TX 75251
214-764-9777NO OFFICER'S FEES HAVE BEEN
COLLECTED BY DALLAS COUNTY CLERK

OFFICER'S RETURN

CC-22-03509-B County Court at Law No. 2

WENDY MONROY ZAPATA vs. LANDSTAR INWAY INC, A CORPORATION, DUVAL SEMI TRAILERS, A CORPORATION, EDWIN HOLLAND II

ADDRESS FOR SERVICE:

1999 BRYAN ST SUITE 900
DALLAS TX 75201-3136

Fees:

Came to hand on the 19th day of July, 20 22, at 8 o'clock A.m., and executed in Dallas County, Texas by delivering to LANDSTAR INWAY INC, A CORPORATION in person, a true copy of this Citation together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION with the date and service at the following times and places to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|--|-------------------------|---|
| <u>Landstar Inway Inc</u> | | |
| <u>Bls Reg Agent</u> | <u>7/19/22 10:44 AM</u> | <u>1999 Bryan St #900, Dallas, TX 75201</u> |
| <u>CT Corporation System through Kirk Atkins</u> | | |

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

_____ and the cause or failure to execute this process is:

_____ and the information received as to the whereabouts of said defendant(s) being:

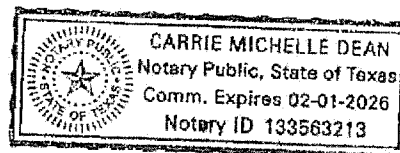
Serving Petition and Copy \$ _____, Officer

Total \$ 80 _____, County, Texas

Heather Bowk
I HAVE SUBSCRIBED BEFORE ME
THIS 19 DAY OF July, 2022

Carrie M. Dean

By: Heather Bowk Deputy
Psc #8133 Exp 2/23/24, Affiant



Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 66549421

Status as of 7/21/2022 3:27 PM CST

Associated Case Party: WENDY MONROY ZAPATA

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------|-----------|-----------------------|----------------------|--------|
| RHIANNON KELSO | | RKELSO@KELSOLEGAL.COM | 7/21/2022 2:24:36 PM | SENT |





THE COUNTY of DALLAS
OFFICE of the COUNTY CLERK
John F. Warren
George Allen Sr. Courts Building
600 Commerce Street, Suite 101
Dallas, TX 75202-3551

CERTIFICATE

CAUSE NO. CC-22-03509-B

WENDY MONROY ZAPATA, PLAINTIFF(S)

VS.

**LANDSTAR INWAY INC, A CORPORATION, AND DUVAL SEMI TRAILERS, A CORPORATION,
AND EDWIN HOLLAND II, AN INDIVIDUAL. DEFENDANT(S)**

I, **JOHN F. WARREN**, County Clerk of Dallas County and Clerk of the County Courts at Law for the County of Dallas, State of Texas do hereby certify and that the following is a **TRUE AND CORRECT COPY OF:**

RETURN OF SERVICE FOR DUVAL SEMI TRAILERS, A CORPORATION, filed on the 21st day of July, 2022. The same appear in the Original now on file and of record in the County Courts at Law of Dallas County, Texas.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE, this **22nd day of June, 2022**.

JOHN F. WARREN, County Clerk
Dallas County, Texas

By:  Deputy Clerk
MOMODOU BAYO



**THE STATE OF TEXAS
CITATION**

CAUSE NO. CC-22-03509-B
COUNTY COURT AT LAW NO. 2
Dallas County, Texas

TO:

DUVAL SEMI TRAILERS, A CORPORATION
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136

"You have been sued. You may employ an attorney. If you or your Attorney do not file a WRITTEN ANSWER with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and PLAINTIFF'S ORIGINAL PETITION, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." Your answer should be addressed to the clerk of County Court at Law No. 2 of Dallas County, Texas at the Court House of said County, 600 Commerce Street, Suite 101, Dallas, Texas 75202.

WENDY MONROY ZAPATA
Plaintiff(s)

VS.

**LANDSTAR INWAY INC, A CORPORATION; DUVAL SEMI TRAILERS, A CORPORATION;
EDWIN HOLLAND II**
Defendant(s)

Filed in said Court on the 5th day of July, 2022, a copy of which accompanies this citation.

WITNESS: JOHN F. WARREN, Clerk of the County Courts of Dallas County, Texas. GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Dallas, Texas, and issued this 18th day of July, 2022 A.D.

JOHN F. WARREN, Dallas County Clerk

By Alicia Mata, Deputy
Alicia Mata



**ATTORNEY
CITATION
PLAINTIFF'S ORIGINAL PETITION
CC-22-03509-B**

IN THE COUNTY COURT OF DALLAS
County Court at Law No. 2
Dallas County, Texas

WENDY MONROY ZAPATA,
Plaintiff(s)

VS.

LANDSTAR INWAY INC, A
CORPORATION; DUVAL SEMI
TRAILERS, A CORPORATION;
EDWIN HOLLAND II, *Defendant(s)*

SERVE:

**DUVAL SEMI TRAILERS, A
CORPORATION**
1999 BRYAN ST., SUITE 900
DALLAS TX 75201-3136

**ISSUED THIS
18TH DAY OF JULY, 2022**

JOHN F. WARREN, COUNTY CLERK
BY: ALICIA MATA, DEPUTY

Attorney for Plaintiff

RHIANNON KELSO
KELSO LAW PLLC
12222 MERIT DRIVE SUITE 1200
DALLAS TX 75251
214-764-9777

NO OFFICER'S FEES HAVE BEEN
COLLECTED BY DALLAS COUNTY CLERK

OFFICER'S RETURN

CC-22-03509-B County Court at Law No. 2

WENDY MONROY ZAPATA vs. LANDSTAR INWAY INC, A CORPORATION, DUVAL SEMI TRAILERS, A CORPORATION, EDWIN HOLLAND II

ADDRESS FOR SERVICE:

1999 BRYAN ST SUITE 900
DALLAS TX 75201-3136

Fees:

Came to hand on the 19th day of JULY, 2022, at 8 o'clock A.m., and executed in Dallas County, Texas by delivering to DUVAL SEMI TRAILERS, A CORPORATION in person, a true copy of this Citation together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION with the date and service at the following times and places to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|---|-----------------|--|
| Duval Semi Trailers Bis Rep Agent | 7/19/22 10:44am | 1999 Bryan St, #900, Dallas, TX 75201 |
| CT Corporation System through Kirk Atkins | | |

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

_____ and the cause or failure to execute this process is:

_____ and the information received as to the whereabouts of said defendant(s) being:

Serving Petition and Copy \$ _____ Officer _____

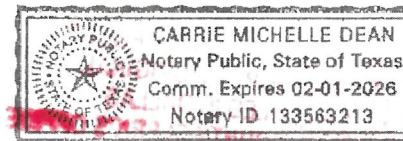
Total \$ 80 _____, County, Texas

By: Heather Berk, Deputy

PSC#8133 Exp 2/28/24, Affiant

Heather Berk
SWORN TO AND SUBSCRIBED BEFORE ME
ON THIS 19 DAY OF July 2022

x Carrie M Dean



Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 66549666

Status as of 7/21/2022 3:37 PM CST

Associated Case Party: WENDY MONROY ZAPATA

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------|-----------|-----------------------|----------------------|--------|
| RHIANNON KELSO | | RKELSO@KELSOLEGAL.COM | 7/21/2022 2:27:42 PM | SENT |



RECEIVED
JUL 27 2022
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA